

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION,
OPIATE LITIGATION**

MDL NO. 2804

Case No. 17-MD-2804

Judge Dan Aaron Polster

THIS DOCUMENT RELATES TO:

Rees v. McKesson Corporation, et al.
MDL Case #1:18-OP-45252

Ellis v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45464

Simonson v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45479

Wood v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45264

DeMaro v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45465

Delancey v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45480

Salmons v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45268;

Cruz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45466

Stewart v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45481

Ambrosio v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45375

Paul v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45467

Shenmake v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45482

Flanagan v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45405

Lechuga v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45468

Weatherwax v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45483

Whitley v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45598

Brumbarger v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45469

Martinez v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45484

Roach v. McKesson Corporation, et al.
MDL Case No. #1:18-OP-45662

Means v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45470

Warren v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45486

Hunt v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-OP-45681

Peterson v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45472

Carlson v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45487

Hanlon v. Purdue Pharma L.P., et al.
MDL Case No. #1:19-op-45052

Hampel v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45473

Flach v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45488

Doyle v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-op-46327

Whittaker v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45475

Ivie v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45489

Moore v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-op-46305

Tuttle v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45476

Cherry v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45490

Artz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45459

Hamawi v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45477

Ortiz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45492

Rodriguez v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45463

Gauthier v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45478

Meinecke v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45493

Brant v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45494

Williams, v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45485

MOTION FOR EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(a) and Rule 15(a)(1)(B), counsel for NAS Plaintiffs in the above-captioned cases seek **a one day** extension of time to file amended complaints and produce completed, signed fact sheets pursuant to the Court's September 30, 2019 scheduling order. (Doc. # 2691.) Good cause exists for this brief extension request, and the brief delay would neither prejudice Defendants nor require extension of any other case management dates.

A court may grant an extension time for good cause shown, upon motion filed before the time has expired. Fed. R. Civ. P. 6(b)(1)(a). Despite the best efforts and undivided attention of NAS Plaintiff's counsel to the task of preparing amended pleadings, counsel anticipate that an extension of time may be necessary. Coordination and finalization of the amended pleadings has taken longer than anticipated due to the complexity of the differing state law issues and the necessary involvement of counsel in multiple states. Due to the importance of the matters at stake, and for the sake of judicial economy, NAS Plaintiff's counsel want to ensure that the amended pleadings will be finalized and perfected so as to minimize the need for further amendment.

NAS Plaintiff's counsel has consulted with counsel for Defendants prior to filing this motion in order to seek agreement, but Defendants oppose this brief extension request. However, the brief extension NAS Plaintiffs seek will not prejudice Defendants, as a one day extension would not cause unnecessary delay or require changing any other case management deadlines.

In sum, NAS Plaintiffs request that for good cause shown, the Court grant NAS Plaintiff's motion for an extension of time and reset the deadline for NAS Plaintiffs to file amended complaints and produce completed, signed fact sheets to October 8, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed via the Court's electronic filing system on October 4, 2019. Notice of this filing will be sent by e-mail through the Court's electronic case-filing system to all counsel of record.

/s/ Marc Dann

Marc Dann